DOCUMENT RESUME

ED 155 794 95 EA 010 651

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TITLE State Efforts to Reduce the Paperwork Burden of Categorical Education Programs. Research Report EPRC 4537-19.
INSTITUTION Stanford Research Inst., Menlo Park, Calif. Educational Policy Research Center.
SPONS AGENCY Office of Education (DHEW), Washington, D.C.
REPORT NO EPRC-4537-19
PUB DATE Mar 78
CONTRACT 300-76-0025
NOTE 41p.

EDRS PRICE MF-$0.83 HC-$2.06 Plus Postage.
DESCRIPTORS Elementary Secondary Education; *Federal Aid; Federal Regulation; Federal State Relationship; Program Administration; *Records (Forms); *State Departments of Education

ABSTRACT

An exploratory survey was conducted of efforts made by selected state educational agencies (SEAs) to reduce the administrative and paperwork burden of federal and state categorical programs. SEAs were selected that were known to be making special grants management efforts and lengthy telephone interviews were conducted with the officials who were most directly responsible for improving grants management and reducing paperwork. The survey states reported using one or more of six separate grants management techniques: standardized applications, consolidated applications (one form used to apply for two or more programs), consolidated planning, consolidated programs, computerized data core, and data and paperwork review committees. Each technique permits some improvement in grants management and paperwork reduction. However, SEA efforts suggest that no single or simple solution is possible. This study concludes that only limited additional improvement can be achieved at the state level. Action is needed at the highest levels of the federal government, both in the form of congressional mandate and in the form of top-level policy direction from the executive branch.
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STATE EFFORTS TO REDUCE THE PAPERWORK BURDEN OF CATEGORICAL EDUCATION PROGRAMS

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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Research Report
EPRC 4537-19

March 1978

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Prepared for:

Office of the Assistant Secretary for Education
Department of Health, Education and Welfare
Washington, D.C. 20201

Contract OEC-300-76-0025

This study was conducted under a contract with the Office of the Assistant Secretary for Education, U.S. Department of Health, Education and Welfare. However, the conclusions and recommendations are solely those of the author and do not necessarily represent the views or policy position of DHEW.

EA 010 651

EXECUTIVE SUMMARY

An exploratory survey was conducted of efforts made by selected state educational agencies (SEAs) to reduce the administrative and paperwork burden of Federal and state categorical programs. SEAs were selected that were known to be making special grants management efforts, and lengthy telephone interviews were conducted with the officials who were most directly responsible for improving grants management and reducing paperwork.

The survey states reported using one or more of six separate grants management techniques: standardized applications, consolidated applications (one form used to apply for two or more programs), consolidated planning, consolidated programs, computerized data core, and data and paperwork review committees. Each technique permits some improvement in grants management and paperwork reduction.

However, SEA efforts to improve the management of multiple grant programs suggest that no single or simple solution is possible. They also suggest that the improvement that can be achieved at the state level is limited. Consolidated programs at the SEA and LEA levels generally did not work out. The usefulness of consolidated applications was limited because common data elements were few and Federal regulations kept changing. Consolidated planning improved the quality of plans and fostered coordination, but it increased rather than reduced paperwork. Data was handled faster by using a computer, but not with fewer people because of Federal regulations against commingling of state administrative funds. Data review efforts at the state level do not affect what the Federal government demands. It is likely that states will increasingly turn to the use of computers in the future to handle Federal program data, though the results to date with such techniques provide scant basis for optimism about their impact.

State officials were nearly unanimous in their opinion that if genuine progress is to be made, changes must start at the Federal level. Several types of changes at the Federal level were suggested. These included multi-year applications, consolidation of programs with similar aims or serving the same target group, coordinated and systematic review of Federal data requests (rather than the isolated review of individual requests now conducted), more flexible use of state management money, and restraint in changing the law and regulations.

This study concludes that only limited additional improvement can be achieved at the state level. Action is needed at the highest levels of the Federal government, both in the form of a Congressional mandate and in the form of top-level policy direction from the Executive Branch. It is time that the Federal government joined with the states and established a partnership for the continuing exploration and implementation of a wide range of alternatives to reduce the administrative paperwork burden.

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ACKNOWLEDGMENTS

The many state officials with whom we spoke provided their time, their insights and their experience to this exploratory study. Their forthright and candid remarks have been liberally quoted in this paper.

I INTRODUCTION

Until recently, Federal education programs affecting elementary and secondary education were a relatively compact enterprise. In 1960, the Federal Government sponsored only about 15 separate education programs with an annual budget of about $460 million.* Moreover, although the Federal Government provided money to elementary and secondary schools, most programs were administered directly by state educational agencies (SEAs) and were subject to what now seems to have been a bare minimum of regulation.

That situation changed with the passage of the Elementary and Secondary Education Act of 1965, which had a first-year appropriation of $1.19 billion that immediately put previous programs in the shade. Even more important than its budget, however, was the new relationship which ESEA created between Federal and state and local levels. ESEA required that a defined target group be reached, that the SEA receive detailed applications from the local educational agencies (LEAs), check them for compliance, set up reporting systems, and monitor and evaluate programs. These demands have been echoed in almost every Federal educational program since that time.

In 1977, the Federal education budget in the elementary and secondary program category was $6.6 billion, which supported 43 programs* and provided 9.0% of the budgets of local elementary and secondary schools.†

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*NCES, "Office of Education Expenditures by Program: Fiscal Years 1960-1977," Digest of Education Statistics, 1976 ed., Table 157 (National Center for Education Statistics, U.S. Government Printing Office, Washington, D.C., 1977).

†Dept. of Commerce, "Public and Secondary Schools--Revenue and Expenditures: 1960 to 1975," Statistical Abstract of the United States--1977, 97th ed. (U.S. Government Printing Office, Washington, D.C., 1976).

The dollar figures tell only a portion of the story, however, for these programs are accompanied by almost 1,000 pages of regulations (45 CFR Parts 100-199, 1976).

Furthermore, the proliferation of Federal categorical programs has been paralleled by the states, as they create similar categorical programs at a rate that shows no signs of slowing, let alone stopping. At last count, California alone had 33 state-sponsored educational programs, in addition to the state's basic support contribution to local schooling, while New York had 6 and Michigan 11. Several new Federal and state programs appeared in FY 1977.

What is clear from these statistics is that a large amount of administrative effort is required to cope with and coordinate paperwork, especially in those states with a large number of categorical programs. Furthermore the impact of the Federal programs is compounded in those states that have their own categorical programs. However, overall numbers alone do not adequately convey what is really involved. Each sheet of paper requires the time of three people: someone to produce the information, someone to write it down, and someone to read it. (This ignores the persons needed to type, mail, copy, and file it.) Where an LEA may apply for many grant programs, the burden can be extreme. Also, many categorical programs encourage districts, directly or indirectly, to acquire special staff (program directors, reading specialists, classroom aides) who remain separate from the regular school staff, which can (in extreme cases) result in fragmentation of school organization. Similarly, while a district may be willing to work with one parent advisory council, the simultaneous existence of several, with different aims, can result in serious difficulties. Finally, at the SEA level, the need to maintain separate staffs for separate programs but with similar or identical duties can cause serious organizational and accounting problems, as well as leading to cumbersome and inefficient staffing patterns.

Even though the administration of so many different programs was seen as posing a problem, SEA personnel understood the rationale behind

categorical programs, and the necessity for many (if not all) of their data requirements. Echoing many of his colleagues, a California official said:

> Realistically, I don't think anybody should say 'give us the money and leave us alone and we'll do good for kids.' If you take the taxpayers' money, by God you're going to have to account for it by filling out some forms to show what you did with it. If the Feds are spending billions of dollars for helping certain children, it seems to me that the people of the United States are entitled to know what you did with the money.

The general purpose of this study was to explore and assess the efforts selected states are making to deal with the problems that arise from having a multitude of categorical programs with different application and reporting forms, different program control mechanisms, and different information needs. The states selected were those known to be making some effort to simplify their management of categorical programs and reduce the paperwork burden. Therefore, the focus is not on what the average state is doing, but on SEAs that have made a concerted effort to tackle the problem.

II METHOD OF APPROACH

The Focus

The state agency was the primary focus of attention. SEAs are frequently designated as the primary administrators of individual Federal programs. Also, Federal audits of categorical programs generally concentrate on the SEA rather than on LEAs, and it is the SEA that bears the consequences of any inappropriate practices. Moreover, it is at the state level that some of the overlap and conflict is created, as states institute additional categorical programs, often in response to the perceived success or failure of earlier Federal efforts.

SEAs make policies and add regulations beyond those indicated by the Federal program agency and design the forms used by the LEAs for application and reporting. Thus, they have some potential ability to ease or worsen the problems that arise from simultaneous categorical programs. Because SEAs differ in the resources they have available, the quality of their staffs, their organizations, and their political cultures, a focus at the state level provides a series of unplanned variations on the theme of program management, which can be useful for the initial exploration of a problem.

Fourteen states were identified for study. Eight states (California, Delaware, Florida, Minnesota, Oklahoma, Vermont, Utah, and Washington) had participated in the Federally funded COGRAM study from 1972 through 1976. The COGRAM (for consolidated grants management) program was designed "to study and to implement improved grants management procedures, including the use of a consolidated application for categorical state and Federal funds." Another five states (Arizona, Colorado, Michigan, Nebraska, and Texas) were identified by the ESEA Title I program office as having attempted a consolidated application of some sort which included

Title I. Finally, Arizona was included because of its much vaunted paperwork reduction task force. Thus, all of these states have been active in innovative grants management techniques of some type.

Method Used

In each state, we attempted to identify the one or two persons who were directly responsible for improving the management of categorical programs or who were most knowledgeable about the history of such efforts. Lengthy telephone interviews were conducted with each person identified, and background materials were collected. Because of the exploratory nature of the effort, we were less concerned with gathering hard data than we were with obtaining information about the point of view of SEA officials and about their conclusions.

In the interviews, we framed the following questions as a starting point:

(1) What have SEAs done to improve the management of multiple Federal (and state) categorical programs?

(2) How successful have SEA efforts been? In particular, what actions or what management techniques have been most helpful and what least helpful?

(3) Are successes or failures (as perceived by state officials) associated with any obvious characteristics of the particular SEA that might help predict the results of similar actions in other states?

From the outset, it seemed obvious that efforts of state officials to improve the management of Federal categorical programs would depend in some measure on the nature of Federal requirements and the attitudes of the Federal program officials to whom SEAs must respond. Therefore, we also wanted to explore two other questions:

(4) How much have Federal officials and Federal agencies cooperated with state-level efforts to improve program management? Are there limits either to their cooperation or to the usefulness of their cooperation?

(5) Are changes needed in policy or procedures that would substantially improve program management but that are beyond the capacity or authority of the SEA? If so, is Federal action required?

The interviews were used, in open-ended fashion, to develop as clear an overview as possible of the general situation, the directions in which proposed remedies were tending, and the prospects for further reform. The results are presented in the following sections, as a set of observations drawn from a selective set of informal interviews. Throughout, we have included specific comments of SEA officials as they responded to our inquiries. These comments often convey a better and more useful understanding of the problems and potentials of SEA grants management than any hard comparative data could provide.

III TECHNIQUES OF MANAGING CATEGORICAL GRANTS

In the course of the telephone interviews, we identified six separate techniques that have been used to streamline the management of categorical programs. These are:

- Standardized applications--Using a standard format for obtaining data from and making application for each of several categorical programs.
- Consolidated applications--Using a single form to apply for two or more different categorical programs simultaneously.
- Consolidated planning--District-wide planning for coordinated use of categorical funds, or coordination of categorical funds with regular district budgets and programs.
- Consolidated programs--Providing funds from state and Federal categorical programs to a district as a single sum of money to meet a defined special need for district services.
- Computerized data core--Using a computer to handle data required for applications and reports.
- Data and paperwork review--Using a panel review process to reduce the amount of redundant or extraneous data required from LEAs.

Each of these techniques will be discussed in turn, with an assessment of how well it worked, or did not work.

Standardized Applications

Description

An effort was made in several states to create a standard format for obtaining data from and making application to each of several categorical programs. Since much of the information that identifies a school district must be entered on any application or report, a standard format at least saves time in locating and reporting on the basic data, and occasionally an LEA can photocopy the initial pages for use on applications for other programs, rather than filling each out from scratch.

Information requirements that differ from one program to the next mean that beyond the first few pages, photocopying is not possible. However, an effort is made to keep as close to the standardized format as possible.

An official in Utah, describing the merits of a standardized application, said: "The USOE forms are too confusing and too chopped up. Nobody could follow them. This form is smaller and better arranged."

States using a standardized application approach also attempt to keep the format constant from year to year, despite the frequent changes in application content that inevitably result from new laws (Federal or state), regulations, and policies.

Assessment

Although this technique reduces the time needed at both state and district levels to puzzle out each new form, it does little to reduce the actual paperwork, since a separate form must still be completed for each program. Moreover, large portions of the data requested for categorical programs have not proven suitable for standardization. Typically, the first four to five pages of each application are standardized to the point where, under optimum conditions, they could be photocopied for use on successive applications to (or reports for) different programs. However, these standard pages are followed by from six to twenty pages of information specific to the program applied for (or reported on). The work may be arranged more comprehensibly, but there is no less of it to be done.

Standardized applications seem to have been one of the earliest and most straightforward grants-management tools. States still using standardization are aware of its limitations, but feel that it is perhaps the best that can be done within the mass of existing regulations applying to each specific program. One official summed up the benefits of a standardized application by saying "There's not much you can do except routinizing things so that at least you can read the forms." Several states that had made early attempts to standardize applications then tried more sophisticated measures, only to return to standardization when more ambitious efforts bogged down.

Consolidated Applications

Description

Some states have attempted to develop a single form that can be used to apply for two or more programs simultaneously. Consolidated applications have been tried for three combinations of programs: various parts of ESEA (e.g., Title I, Part A and Migrant and Title II), ESEA Title I, Part A and various state compensatory education programs; and ESEA with other Federal categorical programs. Even though a school district submits only one application for several programs, the program funds are distributed (and accounted for) separately under each program, to avoid commingling of funds.

Consolidated forms are usually (but not always) established for monitoring and evaluating the programs for which the consolidated application was presented. The underlying rationale was given as:

> Why turn in the same information five times on five almost identical forms? This way there is less paper, less work, and more time to concentrate on what you are going to do with the money instead of filling out applications all year.

Assessment

Despite enthusiastic and persistent attempts to create consolidated applications, this management tool has not proven broadly useful. Many states reported having made several attempts to consolidate applications, only to have each grouping of programs erode over time. As a result, most SEAs have either cut back the scope of their consolidated applications, or discontinued their use altogether.

A good example of what happens to consolidated applications was cited in Washington state:

> We thought we had a pretty good combination, then the [Federal] Indian program dropped out because it said the consolidated application diminished its visibility. Then the next year the gifted program wasn't funded.

One reason for the attrition of programs from consolidated applications was an inability to reduce or resolve the individual program data requirements. One official explained:

> Maybe we can cut down a little here and there on required data, but in the end the programs were just too stiff. We just couldn't do without most of the stuff and still stay legal for audits. All we had really done was staple the applications together.

Another official in a midwestern state said:

> Say we combined Title VI discretionary money and Title III, and guaranteed that a certain percentage would be spent on handicapped. Well you still need two applications: one for the earmarked money and one for the rest--and you're back where you started from.

A second persistent problem appears to have been an inability to persuade the state officials of various programs to relinquish some of their own management prerogatives. A New England SEA official said:

> It's a fear on the part of people in the states losing their responsibilities. Who gets to be the primary administering agency is a real fight, and of course the losers don't have to stay [in the consolidation]. No matter what Washington [D.C.] did, real consolidation, or even better grants management, would need whole reorganizations of state agencies.

A few states had been able to resolve territorial jealousies fairly successfully, often by choosing for "consolidation" those few programs that all fell under a single SEA division. In such situations the threat seemed to be lessened, and program administrators would work hard on consolidation efforts. A Delaware official noted:

> Here, the voc ed falls under the instructional branch like the rest of the handicapped programs. This made it a team effort, and we could draw on whatever was needed. A lot of other states have it tougher that way--voc ed is off by itself and doesn't have to cooperate with anybody.

And a California SEA official agreed:

> We chose the programs (for consolidation) because they were all part of the same bureau, all reported to the same guy. Everybody worked very hard.

Consolidated applications appear most likely to succeed when confined to either competitive grants or formula grants. Attempts to combine these two types of programs typically do not fare well.

The timing, form, and content of applications differ for formula grants and for competitive grants, even when programs address the same target group and objectives. In general, competitive grants take longer to process and are awarded later in the year than formula grants. An application that consolidates the two types means that those LEAs (75% of all LEAs) that will not receive competitive grant money will all have to wait an extra 2 or 3 months to get their formula money.

Efforts to make consolidated applications work are still alive in a few states. A Vermont official was still optimistic: "The concept is excellent, and we're still trying, but we just haven't been able to get the bugs out." But a Minnesota official summed up the more common conclusion, saying: "We're getting a little jaded about consolidated applications."

Consolidated Planning

Description

Consolidated planning is a district-level effort to provide local coordination of multiple categorical programs. Consolidated planning is often used in conjunction with a consolidated application, although the planning component may be used separately (and has been retained in some cases even though the consolidated application has been abandoned). Consolidated planning may be limited to the use of categorical funds, or it may include coordinating categorical programs and funds with regular district budgets and programs. SEA officials sometimes spoke of consolidated planning as the hidden agenda behind consolidated applications, one saying:

> Districts have to stand back and look at all these things together, otherwise they just get random Federal programs that make garbage out of the whole system--personnel, budgets, schedules, the works.

Assessment

Consolidated planning was one motive for trying consolidated applications, and seems to have been relatively successful and long lived, with a number of identifiable benefits. A California official said:

> It [the planning process] has forced teachers and administrators to sit down together and plan a program. This was done in very few schools before .... They had to think it out, and write it down, and in the process, they've become involved again ... it's kind of exciting.

A Minnesota official cited the same reasoning, saying:

> That [planning] was our hidden agenda ... to force the school district--and the state--into a planning operation. They had to really take a total assessment of the entire educational program and to begin ranking your priorities and planning, in a way which districts rarely do.

Similar benefits were cited in Oklahoma:

> There are really so many [good effects]. Perhaps the biggest is that it has brought the state people into alignment with those in the field with whom they work .... And now all of the district program people are together in one district office, so they have to talk to each other--sometimes.

One potential problem arose, however, for a state that attempted a very ambitious consolidated district planning problem:

> We asked our pilot districts to sit down and determine all ... education needs for all of its special populations. Then they entered all the available district resources against these needs. The idea was to slot in state and Federal categorical money to make up the difference. But the [categorical] legislation is often too narrow to respond to the real needs, and the money is too scarce. What's the use of planning if you don't have enough money to make it work? Some of those districts were pretty angry, and I don't blame them.

A major disadvantage of consolidated planning is that it may increase both the amount of paperwork and the amount of time needed to prepare program applications and reports. District planning efforts usually require several meetings of administrators, staff, and parents, and result in detailed written plans--not only for every phase of each categorical program, but also for the coordination of the programs with each

other and with regular district programs and funds. When these reports are required in triplicate or quadruplicate for school, district, and state officials, the resulting paperwork is staggering.

Consolidated Programs

Description

Developing a consolidated program was the eventual goal of a number of early grant-management attempts. Consolidated programs provide, from a number of sources (both state and Federal categorical programs), a single sum of money to meet a defined special need for district services. The effect is to provide a sort of block grant from the state to the district. An SEA official explained:

> This way they can have one program of $150,000 instead of running three at $50,000 each, all with separate plans, separate staffs, and separate reports, and all doing the same thing.

Only Delaware had achieved any genuine program consolidation. Several special education and handicapped programs were consolidated into a single planning, application, and grants system that included both Federal and state categorical programs.

Assessment

Officials in Delaware report that their consolidated program has been well received by districts, and that the consolidation has remained stable--programs have not dropped out. They attribute the success in part to a careful selection of programs:

> We were able to do this in handicapped because they were all competitive type grants [rather than formula grants], the regulations were all very similar.

Interviewees in other states spoke of consolidated programs as a goal, but one whose attainment was not within the control of SEAs at this time. Their consensus was that, given the current multiplicity of acts and regulations, programs could be consolidated in only one or two isolated instances, such as the Delaware programs for the handicapped.

Instead, many officials sought broader grouping of the categorical programs. The comments of two officials are representative:

> What we need to have is a few major categories--like Voc. Ed., Compensatory Education, Handicapped--with certain percentages of dollars assigned to each, then report back on the total from each category. But that has to start in Washington.

Another said:

> I favor consolidation, I really do. We have too many stray programs floating around. Why fool around with set-asides in this program and that program? Why not just make an appropriation for some purpose and leave it like that? It would help a lot, but we [the SEA] can't do it. Without a mandate from Congress, we can't begin to do it.

Computerized Data Core

Description

A computerized data core extracts, stores, and releases basic school district data required for reporting or applying to more than one state or Federal categorical program. The objective is to handle data more efficiently. Under such a system, a piece of information once submitted to the SEA for one program is automatically entered or calculated for the next application, thus saving time and paperwork at both SEA and LEA levels.

One example that was cited (Delaware, not yet implemented) was explained as follows:

> We'd have all the personnel data here [at the SEA]; all they'd have to do on an application is tell us who they're going to use, and then we'd fill it in from there.

Assessment

The popularity of computerizing program information as a grants management technique is growing; most of those we talked to reported that some sort of computer system (often referred to as Central Core Data or CCD) was being set up in their SEA. All of the systems that were reported are in the early stages of implementation. Perhaps because these

systems are still new, the primary use appears to be for storing data and for doing research, rather than for reducing paperwork or lessening the grants management burden. Also, most of the uses of computer information systems are designed to increase capabilities at the SEA level rather than to assist LEAs.

Most LEAs do not yet have either the machinery or the technical expertise to enter needed data directly into the SEA system. Thus, LEAs must continue to fill out hard copy forms that are then sent to the SEA for processing. California has one of the most ambitious computer projects reported to us, and there the absence of local facilities was keenly felt:

> Currently we have almost no terminals in local school districts, and there have been no standard specifications for either the machinery or the programming. But we'll get there.

Regional computing centers (usually called Educational Service Units or Centers) are used in a few instances, but they are no substitute for having a computer or a terminal at the LEA. Even where regional centers feed the state computer, the only effect is to shorten the distance the LEA hard copy must travel.

The persons with whom we spoke tended to be enthusiastic about the computer in general, but they had widely divergent views on the extent to which computer systems could be used in managing Federal categorical programs. Some reported that the data requirements of the Federal programs were simply too idiosyncratic and too frequently changed to make a core data system very useful. One official reported: "The system just isn't ready for something as specific as the Federal programs. I hope it will be within my lifetime." In Texas, the computer was used to determine whether a common core of data would be useful for the Federal programs. The results do much to illuminate the problem:

> We started with the 234 Federal reports, and analyzed the source elements [individual pieces of data requested] for each report. It turned out that there were only 30 common data elements among them. We made that into a single data report, and we're doing a feasibility study now, but to be honest, I've got real doubts about it.

Officials in a few states reported several present or potential uses of computers and common data cores in connection with categorical programs. From Washington, it was reported that:

> In the Title I application, the DRD [Data Retrieval Document] contains descriptions of various components of instructional approaches [project designs]. The district selects the codes that fit the description of their project--codes for staff use, different methods, etc. Then when we [the SEA] have to report to the Feds, we simply call out the information from the computer. That saves us an incredible amount of time, and we don't have to hire an outside contractor.

From Minnesota, it was reported that at least one large district already used a computer-assisted system for preparing needs assessments (a part of the Title I application) and for conducting and reporting on program evaluations. One Minnesota official with whom we spoke was optimistic that once a system had been developed for quantifying needs assessment judgments, it could be used throughout the state. An advantage of that and similar procedures would be to greatly increase the ability of SEAs to monitor local operations. The remark below is typical of several comments made by state officials:

> A really good computer system could help us a lot with monitoring. A lot more monitoring could be done from the capitol instead of having to go on site, and when we did go, we'd have much better information to work against.

A development for the future that seemed of more use to LEAs was the ability to enter and store certain data directly on the state computers and thereby effectively eliminate such data from the application forms. A few respondents spoke of this as a goal, but one they foresaw meeting only in the distant future.

None of our respondents complained about what researchers have come to regard as a common plague--badly designed computer systems full of dirty data. Similarly, the official who contemplated using the computer system to provide personnel data for applications did not mention how the personnel data in the computer were to be kept up to date--a significant problem in any large school system or combination of districts.

It may be that the officials we talked to are not yet aware of the problems that computer systems can bring, or it may be that such problems are seen as being no more than a normal part of starting up a computer system.

Several states are now looking forward to computer systems. However, it is recommended that too much not be expected from the use of computers, either at the SEA level or at the LEA level. Computerized data handling and central core data show considerable promise of speeding the collection and retrieval of data at the SEA level. Given the time, money, and imagination to explore the potentials of computerized data handling, great improvements might be made, in time, in many of the burdensome aspects of state-level grants management. However, benefits to LEAs from such systems will be marginal, at best. Furthermore, we did not find any SEA computer system that is currently complete enough to be of much use to categorical programs, and it is likely to be from 2 to 5 years before even one state can accurately evaluate the impact of its computer data system. However, even then, computer systems can do nothing to rationalize or coordinate programs, and they reduce paperwork only by turning it into magnetic tape work. The computer is far from a panacea.

Data and Paperwork Review

Description

There is a strong feeling among many of the SEA officials interviewed that many pieces of data requested on Federal applications and reports are unnecessary, and SEA officials reported that many LEA officials felt the same way (and extended their feeling to state-mandated applications and reports). Some states have instituted a panel review process to reduce the amount of extraneous and redundant data required from LEAs. Officials requesting information on applications, evaluations, and other forms are asked to justify, in person or in writing, their need and use for each piece of information they seek from state or district personnel. A Colorado SEA official said:

> They [the data review committee] really make you think about what you're doing, and realize how much data you're asking from the districts that is never used at all.

Assessment

Several states sampled reported some kind of data review system and all were highly enthusiastic. In Colorado, the Data Advisory Committee has been in existence for four years. Its job is to advise on and approve every form or data request that is passed from the SEA to LEAs. The committee is composed of volunteer LEA personnel. The SEA official explained:

> These people have a real stake in it--they're not vindictive, but they really make sure that the state people have a real use for everything they ask for. They [the state officials] have to prove that they use the data, not just collect it.

The committee's leverage stems from the fact that LEAs may refuse to complete unapproved forms or requests, and that the SEA cannot deny funding if they do. SEA officials view the process with caution, but LEA response is described as excellent: "Now they [the LEAs] feel represented. They know the committee works hard, and are less resentful of the items that are passed." Thus, the Colorado Data Advisory Committee, while seeming to do little to involve SEA personnel, does exhibit great pride in the level of personal involvement by LEA representatives.

Arizona has established two committees, one for SEA internal review, and one for review by representatives of LEAs. These two committees review every form annually, and review all new forms, assigning a clearance number to each approved form. The printing office will not reproduce a form without a number. The Arizona official with whom we spoke said: "Nobody bootlegs forms around here." Arizona also reported that after a period of initial tension, both SEA and LEA personnel seemed pleased with the results of the data review system.

The data review effort in California is relatively new, and appears to consist of an SEA committee that gives information to local personnel but seems not to include LEAs in decision-making. That the efforts seem to have been fruitful is indicated by the following:

> We've managed to cut out ... a lot of stuff. The criterion is whether there is a statutory requirement. If not, forget it. We're not going to collect any 'nice to know' data. That's easy to say, but [we've] taken a lot of beating about the head and shoulders.

Data review seems to be increasing in popularity, but its limits are narrow. Data that seem useless to LEA personnel and even to SEA officials may still be required by USOE, or by Congress, and this restricts the total improvement that can be achieved by the states and the LEAs. Moreover, data review does nothing to reduce the number of Federal applications or reports, and has little or no impact on the problem of rational coordination of local-level categorical programs. Nevertheless, the data review process has the merits of being simple, inexpensive, and at least as effective as other techniques in removing useless or marginally useful data from forms.

Overall Observations

Several of those interviewed attributed the success (or failure) of grants management efforts to the degree of interest the chief school officer of the state took in the process. Even determined LEA and SEA efforts tended to bog down if no assistance or encouragement was forthcoming from the top.

Attempts to introduce consolidations (or any other grants management tool that required changing "the way we always do it") seem to have done better where the SEA had been through a recent reorganization. A California official remarked:

> We went through a rather traumatic reorganization a few years ago. It didn't work out very well, but it did break down the old bureau structure and that made it a lot easier to introduce consolidation.

Efforts that appear to have succeeded have all included specific attempts to allay the anxieties of LEA and SEA personnel, and to include them in developing the new procedures. This emphasis seems to make it easier for personnel to take the risks implied by adopting new grant-management procedures. An official in Vermont, referring to that state's consolidated application attempts, said:

> The people part is the biggest thing. They'll either block it or sell it. Be very responsive to any anxieties and give out as much information as possible.

Not all states see the grants-management problem in the same light. Our sample selected those states that were fighting the paperwork battle, but certainly some states are not engaged in any such battles. There are states that have not questioned the form and amount of administration associated with Federal programs, or have not been questioned in turn by Federal officials about the efficiency of their management, or have been able to produce state money and personnel adequate to the tasks. To such states, the efforts at grants management related here may seem quixotic.

Also, not every LEA staggers under a load of paperwork, statistics, and regulations produced by the simultaneous existence of many categorical programs. However, big city districts may have three or four dozen Federal and state programs running at once, ranging from Title I grants of millions of dollars to National Science Foundation projects of a few thousand dollars or less. Of these, some will be formula grants requiring detailed surveys of population, others will be competitive grants requiring multiple planning and reporting documents. No one questions that for these districts grants-management needs immediate and far reaching help. But in every state there are some districts (and in some states there are a great many districts) that have no such problems. These are the small-town, suburban and rural districts that receive no more than four or five major grants a year (ESEA Title I, Title IV, Vocational Education, Handicapped, and perhaps SAFA). Their populations and needs are ordinarily quite stable from year to year, and the application and reporting required is minimal. These districts have little to gain from improved grant-management techniques, and hence may even be expected to be somewhat resistant to any change in the status quo.

In summary, states and local school districts that participate in a large number of Federal categorical programs are having real difficulties. Although some states and perhaps many LEAs are not yet affected by the management difficulties posed by categorical programs, most SEAs are worried, and some are approaching a crisis point. Some SEAs have conducted serious and expensive experimentation with a wide range of new techniques for managing multiple grants. Despite marginal returns from state efforts to date, state officials indicate that they will continue

to search for more effective methods to reduce the paperwork burden because they perceive the problems to be severe.

At present, almost all experimentation is being carried out with state-level funds. State legislators are understandably reluctant, however, to spend "their" money on what they consider to be the problems that the Federal government has created. SEA officials highlighted projects to reduce the administrative and paperwork burden as an area where Federal demonstration monies could be effectively spent.

IV IMPLICATIONS OF THE STUDY FOR FEDERAL POLICY

The survey indicates quite clearly that for a number of states and LEAs within those states, the management of Federal and state categorical grant programs is a significant burden, with aspects perceived as wasteful and inefficient. States also perceive that many of the practices that lead to waste and inefficiency cannot be altered without some risk of losing their categorical funds, which have come to constitute a significant portion of total operating budgets.

Locus of Change

Rightly or wrongly, most state officials seem to feel that they have done as much as they can on their own, and that further changes cannot occur without Federal cooperation. No state can unilaterally decide that data required by USOE or mandated by Congress are unnecessary, or that the commingling of funds is justifiable. At the same time, all of those we talked to assumed that the categorical programs would continue to be the basic strategy of Federal assistance, and that recipients of grant funds would (and should) continue to have to account for them.

It appears that the Federal government is not unmindful of the paperwork problem. Federal-level efforts to attack the data burden problem include the OMB Forms Clearance, the Educational Data Acquisition Council (EDAC), the Committee on Evaluation and Information Systems (CEIS), and the Common Core of Data (CCD).

Each of these attempts differs somewhat in its approach or the level of the government at which it operates but each has a common objective, namely to ensure that no redundant of superfluous data are requested by the Federal government. Under the OMB Forms Clearance process, any information required by a Federal agency from 10 or more non-Federal respondents must be justified by the agency and approved by

OMB. EDAC is an in-house DHEW group which reviews and approves all requests for educational data by DHEW agencies (ASE, ASPE, NCES, OE, NIE and OCR) prior to submission for OMB review and approval. This is essentially a self-monitoring device. CEIS represents the Council of Chief State School Offices and is composed of representatives of the state education agencies. CEIS, through its committees, examines all Federal education data acquisition and makes "recommendations" to the report sponsors. Since they can exercise some control over the data sources their recommendations are given careful attention. The purpose of CCD is to simplify and minimize education reporting requirements by identifying data elements common to the needs of LEA's, SEA's and Federal agencies and then generating reports around these elements. Additional description of these organizations is contained in the Appendix.

These mechanisms operate best for one-time surveys, and have not had the impact that they might upon the yearly requests for information from the categorical programs that are the focus of this study. OMB, EDAC, and CEIS all consider each request for data in isolation. None of the three processes considers a request for data on a particular application from the point of view of the LEA that is applying for, say, 35 or 40 different Federal and state categorical programs.

Those we talked to do not perceive Federal sympathy or cooperation in any but a few, very specific areas. Among the exceptions were: all of those interviewed from states that had participated in the COGRAM effort spoke highly of the assistance and cooperation they had received from the program officer assigned to that experiment. His efforts in bringing the several states together and in creating an atmosphere of support were much appreciated. In addition, a number of state officials from many of the states reported considerable after-the-fact interest by one or another Federal official in some state-initiated grants-management techniques. No SEA interviewee, however, could cite any instance in which such interest had led either to the adoption of the technique by the Federal office or by another state.

Many SEA officials had the perception that the Federal government either didn't care, or considered efforts at improved grants management to be, in some way, efforts to get around the regulations. A Minnesota official said:

> There was very little sympathy or support at the Federal level. Nobody got very excited...maybe because nobody there had anything to gain by it.

Another echoed the same feeling when he said:

> We didn't get any support from the Federal program people. I remember that we had some real resistance from Title III and the same with Title I. For 'innovative' programs they were awfully inflexible.

A California official rationalized the lack of cooperation this way:

> The Federal people just weren't supportive--they were afraid of commingling [of funds], lack of audit trails, loss of the ability to see where one program stopped and another ended. They didn't seem to care what the program did or why we did it that way.

And a Texan said:

> We wanted to move toward multiple planning, but the Federal push is toward isolation. They believe that the programs shouldn't be very much alike, so how can they work together?

A Delaware official summed up the problem this way:

> It's the old story--block grants, or anything that brings programs closer together, are good for everybody else, but not for 'my' program. Its purpose is so special that it should be the exception to the rule.

The resistance to change was understood as being at a higher level than the individual Federal program officials, as indicated by the following comment:

> Voluntary consolidations (or other types of change), even where people have good intentions, just aren't the answer. They're still protective of their programs and aware that certain things are required. Change has to start at the top. If you don't have a mandate from OE <u>and</u> from the Congress, you're darned near dead in the water.

Thus, support for across-the-board improvements in grants management is not likely to begin at the program level in the Federal government, since program officials each manage an individual program, for whose success they feel responsible. Making sense out of the system as a whole can only begin in the stratum where the system is seen as a whole--at the leadership levels in the Administration and the Congress. Furthermore, just as efforts in individual states seem to succeed only where they have the active support of the chief state school officer, so national improvements are likely to succeed only where they have active support from the Federal leadership. While it is the regulations that the administration publishes that are the immediate cause of the paperwork burden, the law as written by Congress frequently has requirements and at times information submission dates that allow the program officials little leeway in the regulations they publish. Coordinated Congressional and Executive efforts are needed.

Possible Directions for Change

Putting together everything that was said in our telephone interviews, we can suggest that what SEAs want is not undoable or even impractical. They want less waste in the process of applying for and reporting on categorical grants programs, less conflict between such programs, and less paperwork. They are not asking for less accountability, or even for a free rein (although a bit more flexibility would be highly desirable). There is a recognition that concepts such as "revenue sharing" or "state block grants" have proven to be politically unacceptable. Several possible solutions were suggested: multiyear applications, a better coordinated Federal data review, some consolidation or regrouping of programs that are amenable to such treatment, more flexibility in use of state management money, and some restraint in issuing changes to the law and regulations.

Multiyear Applications

Several SEA-level officials expressed enthusiasm for developing applications that the LEA could fill out that would be good for more

than a single school year. They reasoned that the instructional components, project designs, and demographics of a school district change little from year to year. If tentative approval for these elements could be granted for, say, three years at a time, then at the end of each year it would be necessary to submit only the information that had changed significantly or that would affect the size of the district's grant.

If SEAs could do this, they would not only reduce the amount of paperwork required of the LEA, but also reduce the amount required in the state office as well. Such a reduction in paperwork would free substantial amounts of SEA personnel time for critical on-site monitoring, and make it likely that evaluation reports could be produced on a more timely basis and in a form more useful to the LEAs. Congressional action would be required for this, but the benefits are not insubstantial.

One caveat which should be mentioned is that we are dealing with more than the multiyear application cycle. There are also evaluation cycles and law and regulation change cycles. While the multiyear application will be of benefit by itself, if the evaluation cycle (and the use of this information) and changes in laws and regulations are not coordinated with the multiyear application, the benefit to be derived will certainly be less than its full potential.

Limited Program Consolidation

If programs with similar target groups or with similar purposes could be consolidated under a single administrative authority, then some of the conflicts that arise in implementation of the programs could be prevented, one application could be made instead of several, and activities could be better coordinated. In recent years, some tentative approaches have been made toward program consolidation and revision of the Federal/state relationships in educational policy, such as the ESEA Title IV consolidation. While that was successful in its own way, it has made practically no impression on the larger problem.

Consolidation of programs could also be used to make various educational assistance efforts more closely reflect current Federal goals and

policies. In any case, consolidation is one solution to the problem of a multiplicity of categorical programs that can come only through the combined efforts of Congress and the highest levels of Administration leadership.

Coordinated Review of Federal Data Requests

As indicated earlier and in the Appendix, there are already a number of efforts made by the Federal government to review requests for data. OMB looks over EDAC's shoulder, and CCD and CEIS get their licks in. But it hasn't made the difference one might have hoped. Perhaps part of the reason lies in the practice of looking at forms and data requests in isolation. The real need is to examine each request in context with all others. Only CCD offers the promise of a comprehensive review, and although SEA officials expressed cautious optimism about it, they said that there seemed to be little SEA or LEA input to the selection of core data. One respondent said:

> It's a good idea, but they (the Federal people) are still just talking to each other about what to do with us. We want to get in on it.

SEAs reported some efforts to apply pressure on the Federal program offices to reduce or at least justify their data requests. A State of Washington official reported:

> We like to verify what the Feds say they 'must have.' We don't have time to meet some idiosyncratic need of some bureaucrat back there just because he's curious. We really try to push them in meetings, asking 'why?' and 'where does it say? [that]' but they always fall back on that phrase 'and other information as required.' We don't like that cop-out.

But while no one state can push the Federal system out of shape, the Federal system itself can better coordinate its reviews of data requests. More comprehensive and coordinated review would, at the very least, standardize the forms and eliminate duplication to the extent possible, as well as demanding solid justification for each datum requested.

Ideally, a coordinated review and approval effort should consist not only of Federal officials, but of SEA and LEA officials who would have the authority to disapprove requests. Any such move would represent a far-reaching reform in the relationships between Federal, state, and local levels of education--and a real change from the current situation. (CEIS, for example, provides a state input but does not provide coordinated review).

Any really effective solution to the paperwork problem must be a Federal solution. Joint reviews, merger, or at least better coordination of existing Federal review efforts could achieve improved results at lower cost. Two elements should be stressed in any reform effort: (1) the need to look at the education data system as a whole and, (2) the need for SEA and LEA input.

More Flexible Use of State Management Money

A number of SEA officials suggested that the Federal government could allow the joint use of administrative funds from each of the various Federal programs in whatever way most efficiently serves the combined program needs. In their efforts to coordinate and better manage their Federal grants, some SEA officials reported feeling very constrained by what they interpreted as the need to keep an entirely separate state-level management staff for each Federal program. As it is, if several programs have nearly identical monitoring tasks at the same LEA site, the SEA must send separate monitors from each program staff to avoid misuse of funds. Nor can they even set up a project that would tangentially benefit one Federal program using the staff and resources of another. Hair splitting issues arise. For example, if a common core data document is used, which program's staffer is "supposed" to be used to code, retrieve, or report on the data?

A system for combining administrative funds would allow SEAs to cut down on wasteful and inefficient duplication of staff, and would increase SEA knowledge of conflicts at the LEA level that result from the interaction of programs with different aims. As it is now, such conflicts do not automatically come to the attention of SEA officials, because of the separate program staffs even at the SEA level.

Restraint in Changing Regulations

One of the most frequent complaints of SEA officials was that the regulations seemed to be in a constant state of flux. As a result, any management tool that a state devised to deal with more than one program at a time, whether it was a consolidated application, a computerized data system, or even a standardized application form, was always in need of revision.

Some SEA officials have gone so far as to suggest a temporary moratorium on regulation changes. They feel that there would be substantial improvements in both SEA and LEA management of the programs during the intervening years, enough to make the procedure worthwhile to Federal officials. The most optimistic felt that if only they had a couple of years to run programs without rule changes, the now inevitable and constant "tightening up" of the regulations might even be unnecessary. Obviously, immobilizing regulations would tend to delay "improvement" in some programs longer than many of the Federal program officers would prefer.

Most regulatory changes stem from changes in the law. Some others result from administrative experience. Perhaps a way of regularizing the changes that result from these two processes could be devised which would cut down on the total number of times changes are made.

Interrelationships in the Grants Management System

Our research indicates that requirements for applications, evaluations, and reports are all interrelated. Proper timing and sequencing are important if these are to operate as effective management tools rather than paper pushing exercises. For example, evaluations, if they are to provide feedback for program design, are needed before applications are due.

Changes in the law and regulations can also have a major impact on the system. Suppose, for example, the law were amended so that state applications were due every three years rather than annually. If a reauthorization cycle involving major changes in the requirements were

to come in the midst of that three year period, substantial changes in the application might be needed and the purpose of the longer cycle would be defeated.

Moves toward multi-year applications, regulatory reform and the like will not achieve optimal success unless the sequencing of these processes reflects an understanding of the Federal system as a whole and the interrelationships of its parts.

Overall Observations

The unintended effects of the variety of categorical grant programs act to block the initial goals of those who established the programs: to make sure that the funds are used effectively to assist the target population and not wasted. At present, the administrative and paperwork burden means that significant amounts of money are spent nonproductively; although in each case the administrative costs may be a small portion of the total grant funding, the overall total for an SEA administering 40 such programs can be quite large.

Appendix

FEDERAL EFFORTS TO EASE THE PAPERWORK BURDEN*

There are a number of Federal level efforts attacking the data burden problem. These include OMB Forms Clearance, Educational Data Acquisition Council (EDAC), Committee on Evaluation and Information Systems (CEIS), and the Common Core of Data (CCD). These efforts are described briefly below:

OMB Forms Clearance

Under the Federal Reports Act and B.O.B. Circular A40, the OMB Forms Clearance process is aimed at restraining public reporting to Federal agencies. Any Federally required form or report which goes to ten or more public respondents must be approved by OMB. Any Federal reporting requirement which has not been given an OMB approval number can be ignored by the intended respondent. State and local government units are quite knowledgeable about this point and rarely comply with unapproved reporting requests.

The OMB review is a rigorous one requiring full justification of the report sponsor as to purpose, use, ease of collection, frequency, availability of data, etc. The review even questions the inclusion and wording of individual items. The clearance process often requires months of negotiation between OMB and the requesting agency. Many requests are not approved, and many others are shortened and simplified.

In 1975, President Ford attempted to use the OMB clearance process to reduce the number of reports required from the public by Federal agencies by 10%. This effort had mixed results although it did sensitize many top Federal officials to the reporting burden.

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Educational Data Acquisition Council (EDAC)

Responding to increasing resistance by education institutions and by state and local education agencies to Federally imposed reporting burdens, and encouraged by OMB, the Assistant Secretary for Education established EDAC in 1975 as a self-policing device to review and coordinate reports required by the various units of the Education Division. Subsequently, education reports required by the Office of Civil Rights (OCR) was added.

The Council is composed of top officials of ASE, ASPE, NCES, OE, NIE, and OCR who act as a reports policy and decision body. At the working level, there is an Executive Director aided by several committees composed of representatives of the units in the Education Division. SEA and LEA representatives are invited to participate in the review through the CEIS organization.

The committees are responsible for providing a detailed review of all reporting requirements generated within the Education Division. The review covers purpose, need, frequency, availability of data, ease of collection, possible use of existing data, duplication or overlapping with existing reports, etc. No Education Division report can be submitted for OMB clearance without EDAC's prior approval. Although so far EDAC has focused its attention primarily on new reports, it plans over time to review all ongoing and repetitive reports. Again, its objective is to minimize or reduce data burden and to overcome SEA and LEA resistance to Federal reports by demonstrating a good faith effort.

The Education Amendments of 1976, P.L. 94-482, greatly strengthened EDAC by providing it with a statutory base. The statute provided that the sponsoring agency:

- Present a detailed justification of how the information collected will be used
- An estimate of the man-hours required by each educational agency or institution to complete the request
- Allow an opportunity for comments by the receiving agency prior to transmittal for OMB clearance.

The regulations implementing P.L. 94-482 further required that RFPs and contracts with applicable data collection activities receive preliminary approval by EDAC.

Committee on Evaluation and Information Systems (CEIS)

One of the committees of the Council of Chief State School Officers deals with Federal information requirements. The working arm of the committee is CEIS composed of representatives of the education agencies of all the states and territories. CEIS and its predecessor units has been in existence for over a decade. Its purpose is to provide SEA and LEA review and input into Federal agency information and reporting requirements. CEIS is organized into various subcommittees composed of SEA and LEA representatives who examine each Federal agency education reporting requirement. The CEIS subcommittees meet with the various Federal report sponsors and jointly examine the justification, need and specifications of the reporting requirements in great detail. Since they represent the information providers they exercise considerable "clout." If they recommend disapproval, it becomes very difficult for the Federal agencies to collect the desired information. Over the years they have had a strong restraining influence on unnecessary or inadequately justified reporting requirements and they have been effective in reducing data burden. Even in cases where the reporting requirement has been fully justified and accepted, CEIS has provided valuable advice on how best to collect the needed information. In many cases they have sent the Federal report sponsors back to the drawing board.

Common Core of Data (CCD)

CCD is a concept that has been many years in the gestation process. Sponsored by NCES, and supported by CEIS, the idea is to simplify and minimize education reporting requirements by identifying data elements common to the needs of LEAs, SEAs and the Federal government and then developing reports around these common needs. Up to now at least, each level has generated its own information requirements in isolation. Although Federal needs have not so far satisfied SEA needs, which in turn have not satisfied LEA needs, experience and common sense indicates

that some commonality should exist. The information requirements of each level need to be analyzed, the basic common elements identified, and some adjustments and compromises accepted to make the proposed CCD system workable. NCES has been trying to establish the CCD system for a number of years now, but progress has been hampered because of inadequte funding. Feasibility studies have been conducted; task forces of Federal, state, and local representatives established; workshops held; and priority reporting areas identified, but the first full reporting cycle has not yet been completed. The first two elements of the system, an LEA prepared pupil and staff report, and an SEA prepared report on staffing, revenues, and expenditures have been cleared for submission by LEAs and SEAs respectively.

Analysis

It is apparent that there is considerable redundancy in these four efforts which can be partially explained by the time sequence in which they were established. The Federal Reports Act was first enacted in 1942 and it provided the basis for Budget Bureau (now OMB) review of all forms and reports requested of the public for all government agencies. Chronologically, the CEIS (1970) and its predecessor groups, SEDS and Belmont (mid-1960s) were next.

The SEAs, feeling increasingly burdened by OE and NCES information and data requests, established these groups to collaborate with the Federal agencies in reducing the burden. They were trying in good faith to meet necessary Federal requirements, but at the same time protect their interests against unnecessary or poorly conceived or designed requests. Since they were in control of the source of much of the data, they took a hard-nosed approach and required full justification for all requests. Although CEIS could and did exert considerable pressue on OE, NCES and NIE generated reports they had little influence on reports mandated by the Congress, a large part of the data burden.

Next in point of time was the Common Core of Data (CCD) effort. CCD started around 1970 and grew out of the interaction between NCES and CEIS to try to meet some of their joint data needs and to reduce overall data burden.

EDAC was the most recent group established, with the aim of functioning as an internal Education Division policing mechanism. In part it was a response to increasing pressures by CEIS and in part to pressures by OMB. An agreement with CEIS required the preparation of an annual Education Data Acquisition Plan which listed all reports required by the Education Division and became the basis for CEIS review. A task force headed by NCES was responsible for developing the annual plan which initially was just a compilation of every unit's reporting requirements. The CEIS rigorous review of the plan, plus their insistence on a single coordinating point for all education reporting requirements, soon led to the realization that the Education Division needed to review their own requirements in self-defense, before submission of the annual plan to CEIS. At the same time OMB was encouraging a self-policing effort and indicating that they were going to mandate it government-wide. Thus, EDAC evolved. It was welcomed by CEIS with a tacit understanding that if it did its job well it would greatly reduce and simplify the CEIS task, and CEIS representatives were invited to participate in the EDAC review process.

Understanding the chronology and the motivation for the OMB clearance, CEIS, EDAC and CCD, however, does not eliminate the multiple reviews and the redundancy. A report sponsor has a difficult, time-consuming and exasperating set of hurdles to overcome regardless of the worthiness of his project. Each set of gate-keepers has its own perspectives and does not completely accept the other's effort. Thus, CEIS participates in part with EDAC, but still exercises the right to its own review, and sometimes differs with EDAC conclusions about individual reports. OMB conducts its review as if the other groups did not exist. The result of all the reviews is some reduction in data burden, but at tremendous cost and effort in the review procedure itself. Joint reviews, merger, or at least better coordination of efforts could achieve results quicker and at far less cost.